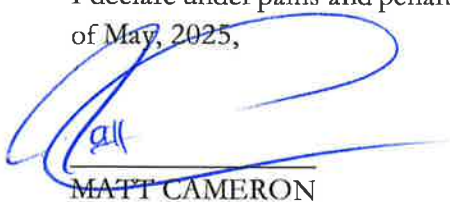


DECLARATION OF COUNSEL

- 1) My name is Matt Cameron. I am a licensed attorney in Massachusetts (#664359) in good standing, presently representing Venezuelan ICE detainee D.E.H. *pro bono*.
- 2) Together with my client's *habeas* petition we are today filing a motion to preserve his identity pseudonomously. I am providing this declaration to confirm my specific knowledge as an officer of the court as to why this is necessary.
- 3) My client is included as a dependent in his wife's application for asylum filed with USCIS on November 14, 2023 in which she outlines her fear of return to Venezuela based upon political persecution by the Venezuelan government. I have a copy of this application and have reviewed it closely. Based on the facts alleged in this application and specific statements my client's wife has made to me as to her fear of return to Venezuela, I have good reason to believe that my client and his family would be in physical danger if these details—including the names of my client and his immediate family members—were to be released to the public.
- 4) My client's wife and minor stepson both fear that the revelation of their names could lead to further enforcement action. Although they are both applicants for asylum with no factors which would make them a priority for ICE enforcement, they are justifiably concerned by ICE's recent pattern of targeting family members of detainees who are in any way public about what has happened to them.
- 5) Under these circumstances I believe that proceeding pseudonymously would be in the best interests of my client and his family.

I declare under pains and penalties of perjury that the foregoing is true and correct. Executed this 7th of May, 2025,



MATT CAMERON